

STEVE W. MYHRE
Acting United States Attorney
CRISTINA D. SILVA
Assistant United States Attorney
Nevada Bar No. 13760
501 Las Vegas Blvd. South, Suite 1100
Las Vegas, Nevada 89101
PHONE: (702) 388-6336
FAX: (702) 388-5087
cristina.silva@usdoj.gov

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRETT COMBS,

Defendant.

2:10-cr-00173-KJD-RJJ

STIPULATION TO CONTINUE
THE RESPONSE TO
DEFENDANT'S SENTENCING
MEMORANDUM (Doc. #264)

IT IS HEREBY STIPULATED AND AGREED, by and between STEVE W. MYHRE, Acting United States Attorney, and Cristina D. Silva, Assistant United States Attorney, counsel for the United States of America, and Joel Mann, Esq., counsel for defendant BRETT COMBS, that the Government's response to Defendant's Sentencing Memorandum, in the above-captioned matter. The Government's response is currently due April 6, 2017. The United States seek a brief extension, that is modifying the due date to April 10, 2017.

This Stipulation is entered into for the following reasons:

1. Counsel for the Government, AUSA Cristina D. Silva has been diligently

1 working to complete the response, however, was unable to finalized the response due to
2 two back-to-back suppression hearings in *United States v. Mendoza* and *Untied States*
3 *v. Dittiro*, where were held on April 5 and 6, 2017 respectively. Further, AUSA Silva
4 was out of the District on Monday, April 3, 2017.

5 2. Counsel for the Government made contact with defendant's counsel who
6 kindly advised he did not object to a brief continuance.

7 3. The defendant is in custody but does not object to a brief continuance of
8 the response deadline.

9 4. The additional time requested herein is not sought for purposes of delay,
10 but to allow for counsel for the Government to be available to file the response, taking
11 into account due diligence.

12 5. This is the first request to extend the response deadline.

13 DATED this 6th day of April, 2017.

14
15 DANIEL G. BOGDEN
16 United States Attorney

17 //s//

//s//

18 JOEL MANN, ESQ.
19 Counsel for Defendant -
20 Brett Combs

21 CRISTINA D. SILVA
22 Assistant United States Attorney
23
24

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

BRETT COMBS,

Defendant.

2:10-cr-00173-KJD-RJJ

STIPULATION TO CONTINUE
THE RESPONSE TO
DEFENDANT'S SENTENCING
MEMORANDUM (Doc. #264)

Based on the pending Stipulation of counsel, and good cause appearing
therefore, the Court hereby finds that:

1. Counsel for the Government, AUSA Cristina D. Silva has been diligently
working to complete the response, however, was unable to finalized the response due to
two back-to-back suppression hearings in *United States v. Mendoza* and *Untied States*
v. Dittiro, where were held on April 5 and 6, 2017 respectively. Further, AUSA Silva
was out of the District on Monday, April 3, 2017.

2. Counsel for the Government made contact with defendant's counsel who
kindly advised he did not object to a brief continuance.

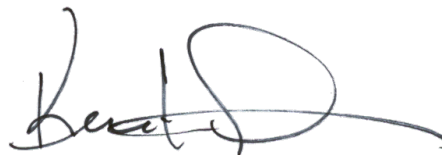
3. The defendant is in custody but does not object to a brief continuance of
the response deadline.

4. The additional time requested herein is not sought for purposes of delay,
but to allow for counsel for the Government to be available to file the response, taking
into account due diligence.

1 5. This is the first request to extend the response deadline.

2
3 Based on the foregoing stipulation of counsel the Court hereby ORDERS that
4 the deadline for the Government to respond to defendant's sentencing memorandum
5 (Doc. #264) is hereby reset to April 10, 2017.

6
7 Dated this 7th April, 2017.

8
9 

10 THE HONORABLE KENT J. DAWSON
11 United States District Court Judge